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Attorney for Defendant DENISE LASHAWN REED

United States District Court
 Northern District of California

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DENISE LASHAWN REED,

Defendant.

No. 4:12-cr-00878-YGR-1

STIPULATION AND ORDER
 TO CONTINUE STATUS CONFERENCE

Defendant DENISE LASHAWN REED, by and through her undersigned counsel and the United States of America, through Assistant United States Attorney CYNTHIA LEWIS STIER, hereby stipulate that the Court vacate the further status conference in the above captioned case currently set for Thursday, May 2, at 2:00 p.m., and continue it to June 6, 2013, at 2:00 p.m. It is further requested that the Court exclude time under the Speedy Trial Act between March 14, 2013, when the parties last appeared before this Court, and June 6, 2013.

The parties are currently engaged in plea discussions, and the defendant requests additional time to review discovery and investigate the charges filed by the Government. Defense counsel is currently scheduled to begin a jury trial on People v. Mosqueda, Case No. H51281, in the county of Alameda on May 1, 2013. This case is a multiple count 288(A) case in which multiple witnesses have been subpoenaed to testify and is expected to last approximately three

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§ weeks. Additionally, defense counsel is expecting the birth of his
 § second child on May 23, 2013 and will be taking one week of family
 § leave beginning on that date through May 31, 2013.

§ To allow the parties to continue plea discussions and for
 § defendant to continue preparation of her defense, the parties
 § respectfully request that the status conference set for Thursday, May
 § 2, 2013 at 2:00 p.m. be vacated and that this matter be reset to
 § Thursday, June 6, 2013, at 2:00 p.m. for further status conference.
 § The parties further stipulate and agree that the time between March
 54 14, 2013, and June 6, 2013, should be excluded under the Speedy Trial
 55 Act for effective preparation and continuity of counsel, pursuant to
 56 18 U.S.C. § 3161(h)(7)(B)(iv).

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58 **IT IS SO STIPULATED.**

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5: DATED: May 1, 2013

_____/s/ HEC

H. ERNESTO CASTILLO

5; Attorney for DENISE LASHAWN REED

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5= DATED: May 1, 2013

_____/s/ RJB

ROBERT J. BELES

64 Attorney for DENISE LASHAWN REED

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66 DATED: May 1, 2013

_____/s/ CS

CYNTHIA LEWIS STIER

67 Attorney for the UNITED STATES OF AMERICA

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69 **IT IS SO ORDERED.**

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6; DATED: May 1, 2013

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HON. YVONNE GONZALEZ ROGERS
 United States District Judge